

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

FATIHA HAOUASS

v.

TERRY TURNER

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CIVIL ACTION NO: 1:22-cv-00855

DEFENDANT'S INITIAL DISCLOSURES

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Defendant, Terry Turner, files his Initial Disclosures as follows:

A. INDIVIDUALS WITH RELEVANT INFORMATION:

As a result of the incident, which is the subject of this Request, criminal charges have been filed against Mr. Turner. Thus, on the advice of counsel, Mr. Turner refuses to respond to this Request based on the protections afforded under the Fifth Amendment to the United States Constitution.

B. DOCUMENTS BEARING SIGNIFICANCE ON CLAIMS AND/OR DEFENSES:

As a result of the incident, which is the subject of this Request, criminal charges have been filed against Mr. Turner. Thus, on the advice of counsel, Mr. Turner refuses to respond to this Request based on the protections afforded under the Fifth Amendment to the United States Constitution.

C. DAMAGES:

Plaintiff seeks monetary damages under a claim for wrongful death, including damages for loss of consortium, past and future mental anguish, attorney's fees, costs of court, and pre/post judgment interest.

D. INSURANCE INFORMATION:

Defendant will supplement.

Respectfully submitted,

GERMER PLLC

By: /s/ Robin N. Blanchette

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**ATTORNEY FOR DEFENDANT
TERRY TURNER**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument has been duly served on the following counsel through the Court's CM/ECF system on this the 20th day of December, 2022:

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